OFFICE OF THE DEPUTY UNDER SECRETARY OF DEFENSE (ENVIRONMENTAL SECURITY)

Updating the BRAC Cleanup Plan:

A Living Tool for Integrating Reuse and Cleanup

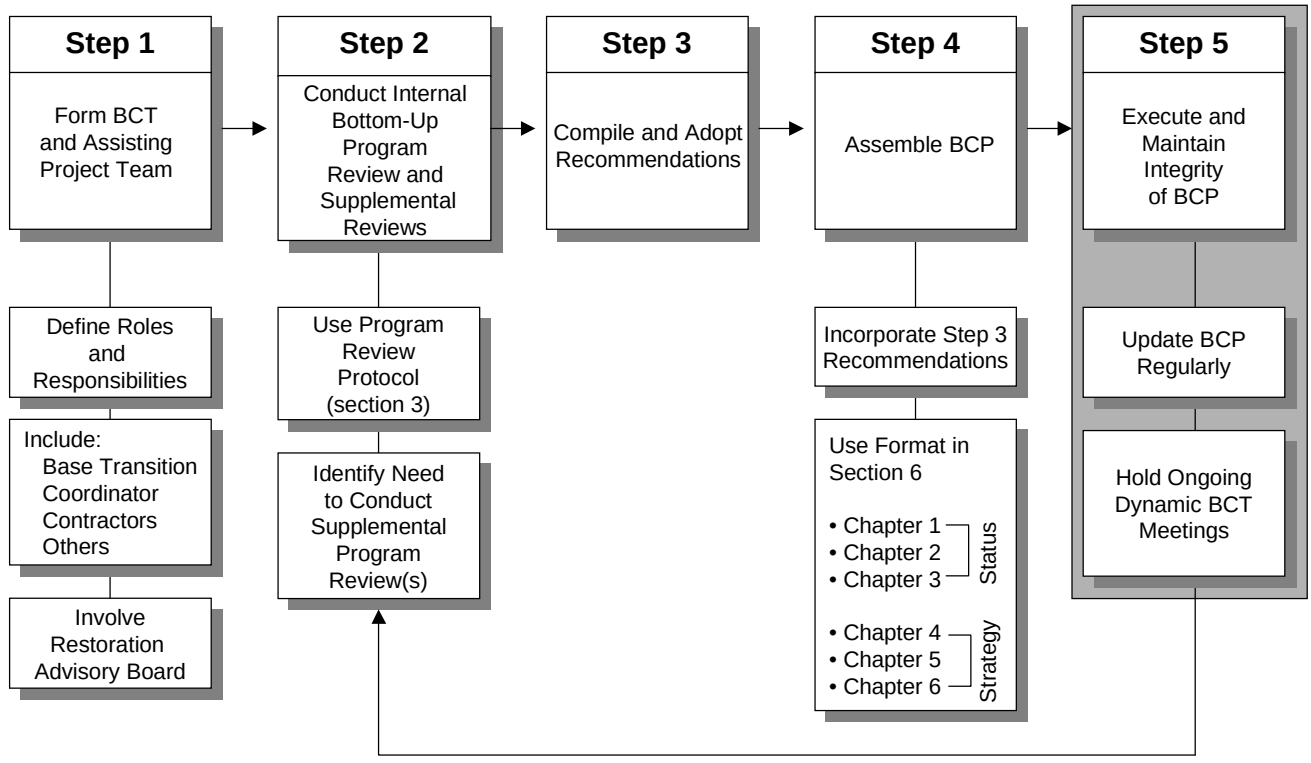
Introduction/Purpose

This fact sheet has been developed for Base Realignment and Closure (BRAC) Cleanup Teams (BCTs) that have completed a bottom-up review and prepared an initial BRAC Cleanup Plan (BCP) (i.e., Version 1 BCP). The final step in the BCP process is executing and maintaining the BCP as shown in the figure below. This fact sheet is intended to highlight sections of the BCP that should be updated and modified to keep the BCP a "living document" that helps the BCT to integrate reuse and manage restoration efforts. BCTs should use the information in this fact sheet to focus their efforts in updating their BCP every 9 to 18 months.

What is the BCP?

The BCP is a living document used to formalize the results of the bottom-up review process. It is a road map that the BCT uses to expedite and improve environmental response actions and integrate them with redevelopment activities, plans, and schedules. According to the BCP Guidebook, the BCP "should be updated and modified regularly to reflect status, strategy, and schedule changes, as well as issue resolution." The BCP process is a five-step process, as outlined in the figure below (Figure 1-2 from the BCP Guidebook).

The Five-Step BCP Process



Form SF298 Citation Data

Report Date *("DD MON YYYY")* 00 Mar 1999	**Report Type** N/A	**Dates Covered (from... to)** *("DD MON YYYY")*

Title and Subtitle Updating the BRAC Cleanup Plan: A Living Tool for Integrating Reuse and Cleanup	**Contract or Grant Number**
	Program Element Number
Authors	**Project Number**
	Task Number
	Work Unit Number
Performing Organization Name(s) and Address(es) Office of the Under Secretary of Defense Acquisition and Technology 3000 Defense Pentagon Washington, DC 20301-2000	**Performing Organization Number(s)**
Sponsoring/Monitoring Agency Name(s) and Address(es)	**Monitoring Agency Acronym**
	Monitoring Agency Report Number(s)
Distribution/Availability Statement Approved for public release, distribution unlimited	
Supplementary Notes Document has color	

Abstract
This fact sheet has been developed for Base Realignment and Closure (BRAC) Cleanup Teams (BCTs) that have completed a bottom-up review and prepared an initial BRAC Cleanup Plan (BCP) (i.e., Version 1 BCP). The final step in the BCP process is executing and maintaining the BCP as shown in the figure below. This fact sheet is intended to highlight sections of the BCP that should be updated and modified to keep the BCP a "living document" that helps the BCT to integrate reuse and manage restoration efforts. BCTs should use the information in this fact sheet to focus their efforts in updating their BCP every 9 to 18 months.

Subject Terms	
Document Classification unclassified	**Classification of SF298** unclassified
Classification of Abstract unclassified	**Limitation of Abstract** unlimited

Number of Pages 4	

What is the BCP Abstract?

The BCP Abstract is the executive summary of the BCP. It is updated annually and is submitted by each Service Component to the Department of Defense (DoD) in November of each year. Although the abstract serves as the executive summary of the BCP, it can be prepared without updating the entire BCP. The abstract is used to review Fast-Track Cleanup efforts by identifying successes, issues, and areas in which further policy and guidance may be needed; the abstract is also used to analyze trends and track progress made.

Where to Focus Updates of the BCP After Version 1

The following sections of the BCP should be reviewed every 9 to 18 months to determine whether they need revision:

- Chapter 1.3, BCT/Project Team
- Chapter 2.0, Property Disposal and Reuse Plan
- Chapter 3.4, Environmental Condition of Property
- Chapter 5.1, Environmental Restoration Program

Chapter 1.3, BCT/Project Team

A key element in the Fast-Track program is identifying all personnel that make up the Project Team and involving them, as needed, throughout the restoration process. Team members are identified during the initial bottom-up review and the preparation of the Version 1 BCP and are recorded in Table 1-1, Current BCT/Project Support Team Members. As the environmental restoration and redevelopment processes proceed, team members may change, new roles and responsibilities may be established, and contact information may require updating so that the appropriate team members are included in meetings for consultation. Table 1-1 of the BCP should be updated to reflect any changes. The BCP Distribution List also should be updated. In addition, team members who participated during the initial bottom-up review should be highlighted in Table 1-1 and may be called on to provide technical assistance in maintaining the integrity of the BCP.

Chapter 2.0, Property Disposal and Reuse Plan

Property cleanup, disposal, and reuse are iterative, interrelated processes. Chapter 2 is intended to provide information to help focus environmental restoration activities on supporting the communities' redevelopment and property reuse efforts. The Base Transition Coordinator (BTC) serves as a DoD coordinator and facilitator to the DoD Component and the Local Redevelopment Authority (LRA). BTCs are ombudsmen and act as honest brokers and advocates for the base closure and community redevelopment process. The BCT should use the BTC as a resource to coordinate information needs and as a channel for accurate information regarding the cleanup, closure, and redevelopment processes

Local Redevelopment Authority — *The LRA is usually created by elected local or state officials and recognized by DoD. The LRA is responsible for representing the community's interests. It has responsibility for preparing and implementing a redevelopment plan for the property made available to the community. The LRA works with the BTC, BCT, Installation Commander, and others to ensure that environmental issues are considered in making reuse decisions. It serves as the community's point of contact for all matters related to reuse, acting as an interface between the community, the installation, and the DoD Component (through the BTC).*

Redevelopment Plan – *This plan identifies the LRA's overall reuse strategy for the installation. The LRA and the community (through public input) must ensure that the redevelopment plan adequately balances local community and economic development needs with those of the homeless. This plan also incorporates environmental considerations such as cleanup activities, air emissions credits, natural resource concerns such as endangered or threatened species and habitat, and cultural and historical requirements. The comprehensive land-use plan, a component of the redevelopment plan, should be of particular use to the BCT in identifying land use assumptions.*

CERFA EBS — *The Service Component prepares an Environmental Baseline Survey (EBS) for each installation being closed or realigned. The EBS is based on all existing environmental information related "to storage, release, treatment, or disposal of hazardous substances or petroleum products on the property to determine or discover the obviousness of the presence or likely presence of a release or threatened release of any hazardous substance or petroleum product." Although the Community Environmental Response Facilitation Act (CERFA) initially was concerned with storage of petroleum, storage is no longer a factor in classifying property, and the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) excludes petroleum.*

Restoration Site — *A distinct area of an installation containing one or more releases or threatened releases of hazardous substances treated as a discrete entity or consolidated grouping for response purposes. A restoration site includes any building, structure, impoundment, landfill, storage container, or other site or area where a hazardous substance was or has come to be. Installations may have more than one site.*

between the BCT and the LRA. The BTC also helps in building consensus and understanding of issues pertaining to environmental restoration and community redevelopment.

Knowing the LRA's proposed intended use of the property, the BTC and the BCT can better identify any potential inconsistency between the proposed use, the environmental condition of property, and the planned cleanup activities that may require the LRA to reexamine reuse and land use decisions.

For example, the LRA's initial proposal may include a housing area located on a 100-acre open space. On examining the environmental condition of that property, the BCT may discover that the past use of the open space may not be compatible with the proposed reuse. In a collaborative effort among the LRA, the BTC, and the BCT, the reuse plan can be modified to place the residential area in an alternate, more suitable location.

To ensure that cleanup and redevelopment are integrated, the LRA must provide the BCT with key information, including the LRA's comprehensive land-use plan, any changes to reuse plans, specific parcels identified for early reuse, and a redevelopment schedule and phasing plan. Reuse and redevelopment information is evaluated against the environmental condition of property gathered by the BCT for the requirements discussed in Chapter 3.4 of the BCP Guidebook. The Finding of Suitability to Transfer and Finding of Suitability to Lease schedules should be developed and reviewed by the BCT and the LRA to ensure compatibility and identify potential delays and problems.

For additional information, see BCP Guidebook, Table 3-1, Program Review Roadmap, Steps 27 through 33.

Chapter 3.4, Environmental Condition of Property

The environmental condition of property changes as additional information becomes available. The DoD Component makes the initial determination during the Community Environmental Response Facilitation Act (CERFA) Environmental Baseline Survey (EBS). This determination is based on records review, interviews, site reconnaissance, restoration of sites, and review of aerial photographs. A map showing the condition of property is generated to provide a visual understanding of the property. The initial review may identify property that requires additional evaluation (Category 7). As the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) investigation continues, these Category 7 areas are reclassified. The BCT must keep this map updated as the CERCLA investigation continues. This map, with updated information, should be a useful tool in the LRA's continuing reuse planning and redevelopment activities.

Figure 3-1 of the BCP Guidebook, Environmental Condition of Property, maps the environmental conditions, while Figure 3-2, Suitability of Property for Transfer by Deed, maps property according to whether it can be transferred by deed (Categories 1-4) or not (Categories 5-7) under CERCLA. However, Category 5-7 properties may be leased, or transferred using Early Transfer procedures, for appropriate reuse. These maps should be overlaid on the LRA's land reuse plans and the disposal parcel plan. This important exercise provides the BCT with the opportunity to visualize and focus restoration work on areas planned for reuse. BCTs should review the overlay with the LRA to ensure a clear understanding of the order or priority for restoration activities. Another useful tool in discussions with the LRA on integrating reuse and cleanup is provided in the February 1996 "Guide to Assessing Reuse and Remedy Alternatives at Closing Installations." These types of exchanges with the LRA will help build a solid relationship and open dialogue between the two groups and reduce the likelihood of later misunderstandings regarding reuse plans and possibilities and the environmental restoration requirements.

For additional information, see BCP Guidebook, Table 3-1, Program Review Roadmap, Step 9.

Environmental Condition of Property Categories

1 Areas where no release or disposal of hazardous substances or petroleum products has occurred (including no migration of these substances from adjacent areas)

2 Areas where only release or disposal of petroleum products has occurred

3 Areas where release, disposal, and/or migration of hazardous substances has occurred, but at concentrations that do not require a removal or remedial action

4 Areas where release, disposal, and/or migration of hazardous substances has occurred and where all remedial actions necessary to protect human health and the environment have been taken

5 Areas where release, disposal, and/or migration of hazardous substances has occurred and where removal or remedial actions are under way, but where all required remedial actions have not yet been taken

6 Areas where release, disposal, and/or migration of hazardous substances has occurred, but where required actions have not yet been implemented

7 Areas that have not been evaluated or require additional evaluation

Chapter 5.1, Environmental Restoration Program

This section is used to develop the overall restoration schedule for the installation. The overall restoration schedule must be based on identified restoration sites, the community's intended reuse schedule phasing, and the cost-to-complete estimates submitted to DoD for the restoration database. Cost directly affects the BCT's efforts to investigate, remediate, and make land available for reuse. Properly scheduling and executing cleanup requires a yearly update to determine and verify the accuracy of cost-to-complete data and identify any changes in reuse that may affect the cost-to-complete. The cost-to-complete update should be used by the BCT to program work within installation budgetary constraints. The overall restoration schedule should always be tied to the planned reuse (Chapter 2) and the environmental condition of the property (Chapter 3.4). A Gantt-type chart format is used to lay out the schedule.

For additional information, see BCP Guidebook, Table 3-1, Program Review Roadmap, Step 17.

Summary

This fact sheet is only a guide for streamlining BCP updates after Version 1. It focuses on updating the project team listing and the Environmental Condition of Property map, and constant monitoring of reuse schedules and phasing to ensure an appropriate overall restoration schedule. In updating the BCP, the BCT should seek input from the RAB and other stakeholders in addition to having discussions with the LRA. Because the BCP is a living document, the BCT may determine that it is necessary to update other chapters and sections of the BCP as additional environmental and reuse information is received or installation conditions change. It is not necessary to reprint and recopy the entire BCP each time a change is made. Changes may be tracked by "pen and ink" or by reprinting the modified page.

Contact your Component for specific policies and guidance related to updating your BCP.

References

BRAC Cleanup Plan Guidebook (Fall 95)
http://www.dtic.mil/envirodod/brac/toc.html
1998 BRAC Cleanup Plan Abstract format and instructions (October 98)
http://www.dtic.mil/envirodod/brac/publish.html
Fast-Track Cleanup at Closing Installations (May 96)
http://www.dtic.mil/envirodod/brac/reissued.html
Guide to Assessing Reuse and Remedy Alternatives at Closing Installations (February 1996)
http://www.dtic.mil/envirodod/brac/guide.html
Management Guidance for the Defense Environmental Restoration Program (March 98)
http://denix.cecer.army.mil/denix/Public/ES-Programs/Cleanup/DERP/guide.html
Overview of the Fast-Track Cleanup Program (Spring 97)
http://www.dtic.mil/envirodod/brac/cleanup.html

This and other documents on the BRAC Environmental Cleanup Program are available at: *http://www.dtic.mil/envirodod/brac/*

We welcome and invite your comments on this fact sheet, as we seek ways to improve the information provided. Please send comments to the following address:

OADUSD (Environmental Cleanup)
Attn: Fast-Track Cleanup
3400 Defense Pentagon
Washington, DC 20301-3400